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1 IN THE UNITED STATES BANKRUPTCY COURT
2 FOR THE DISTRICT OF NEVADA

3 In re:

4 Case No. 21-14486-abl

5 INFINITY CAPITAL MANAGEMENT, INC.,

6 Chapter 7

7 Debtor.

8 HASELECT-MEDICAL RECEIVABLES
9 LITIGATION FINANCE FUND
10 INTERNATIONAL SP.,

11 Adversary Case No. 21-01167-abl

12 Plaintiff,

13 v.

14 TECUMSEH-INFINITY MEDICAL
15 RECEIVABLES FUND, LP.,

16 Defendant/Counterclaim
17 Plaintiff,

18 v.

19 HASELECT-MEDICAL RECEIVABLES
20 LITIGATION FINANCE FUND
21 INTERNATIONAL SP, and ROBERT E.
22 ATKINSON, CHAPTER 7 TRUSTEE,

23 Hearing Date: May 12, 2022
24 Hearing Time: 9:30 a.m.

25 Counterclaim Defendants.

ROBERT E ATKINSON, CHAPTER 7 TRUSTEE,

Counter Plaintiff,

V.

**TECUMSEH-INFINITY MEDICAL
RECEIVABLES FUND, LP,**

Counter Defendant.

**STIPULATION BETWEEN HASELECT-MEDICAL RECEIVABLES
LITIGATION FINANCE FUND INTERNATIONAL SP AND TECUMSEH-
INFINITY MEDICAL RECEIVABLE FUND, LP TO:**

(I) CONTINUE HEARING DATES ON MOTION FOR PARTIAL SUMMARY JUDGMENT AS TO CERTAIN DISPUTED RECEIVABLES [DE #53] AND MOTION TO DISMISS ALL CLAIMS FOR LACK OF SUBJECT MATTER JURISDICTION [DE #59]; AND (II) EXTEND RELATED DEADLINES

This stipulation (“**Stipulation**”) is made by and between Defendant Tecumseh–Infinity Medical Receivables Fund LP (“**Tecumseh**”), by and through its counsel, Garman Turner Gordon, and Plaintiff HASelect-Medical Receivables Litigation Finance Fund International SP (“**HASelect**,” and together with Tecumseh, “**Parties**”), by and through its counsel, Shea Larsen, with regard to: (1) *Plaintiff HASelect-Medical Receivables Litigation Finance Fund International SP’s Motion for Partial Summary Judgment as to Certain Disputed Receivables* [ECF No. 53] (“**Motion for Partial Summary Judgment**”); and (ii) *Tecumseh-Infinity Medical Receivable Fund, LP’s Motion to Dismiss all Claims for Lack of Subject Matter Jurisdiction* [ECF No. 59] (“**Motion to Dismiss**”).

RECITALS

1. HASelect's Motion for Partial Summary Judgment and Tecumseh's Motion to
Dismiss were both filed on March 22, 2022.

23 2. Both motions are scheduled for hearing on May 12, 2022 at 9:30 a.m. Tecumseh's
24 counsel requested that the hearing be rescheduled because a scheduling conflict arose for
25 Tecumseh's lead counsel, Michael Napoli, on May 12, 2022.

26 3. Pursuant to LR 7056, Tecumseh's opposition to the Motion for Partial Summary
27 Judgment is currently due on April 12, 2022 and HASelect's reply is due on April 26, 2022.

4. As the Motion for Partial Summary Judgment involves significant issues and substantial evidence, Tecumseh's counsel requested a brief extension of the opposition deadline.

STIPULATION

NOW, THEREFORE, the Parties stipulate and agree as follows, subject only to entry of an order approving this Stipulation:

1. The hearing on HASelect's Partial Motion for Summary Judgment (ECF No. 53) shall be continued from May 12, 2022, at 9:30 a.m., to **May 26, 2022, at 9:30 a.m.**

2. The hearing on Tecumseh's Motion to Dismiss (ECF No. 59) shall be continued from May 12, 2022, at 9:30 a.m., to **May 26, 2022, at 9:30 a.m.**

3. The deadline for Tecumseh to file and serve its memorandum of points and authorities in opposition to the Partial Summary Judgment Motion shall be extended from April 12, 2022 to **April 28, 2022** and the deadline for HASelect to file and serve its reply memorandum of points and authorities shall be extended from April 26, 2022 to **May 12, 2022**.

4. Pursuant to LR 9014(d), the opposition and reply deadlines for the Motion to Dismiss shall be May 12, 2022 and May 19, 2022, respectively.

IT IS SO STIPULATED.

DATED this 12th day of April, 2022.

GARMAN TURNER GORDON LLP

SHEA LARSEN

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